

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NORTH CAROLINA
GREENVILLE DIVISION

IN RE:)	
)	Case No. 19-00730-5-JNC
CAH ACQUISITION COMPANY #1, LLC d/b/a)	
WASHINGTON COUNTY HOSPITAL,)	Chapter 11
)	
Debtor.)	
)	
)	

THIRD APPLICATION FOR APPROVAL TO PAY CO-COUNSEL FOR THE TRUSTEE'S
FEES

NOW COME Jason L. Hendren, Rebecca F. Redwine and the firm Hendren, Redwine & Malone, PLLC ("Hendren Redwine"), and submit this Application for Approval to Pay Co-Counsel for the Trustee's Fees, and show unto the Court as follows:

1. An involuntary petition for relief under Chapter 7 of the United States Bankruptcy Code was filed on behalf of the Debtor on February 19, 2019.
2. An Order appointing Thomas Waldrep as Trustee for the Debtor was approved on February 22, 2019.
3. The Debtor filed a Motion to Convert the Involuntary Chapter 7 Case to a Chapter 11 case on March 14, 2019, and the Motion was approved on March 15, 2019.
4. Jason L. Hendren, Rebecca F. Redwine and the firm Hendren, Redwine & Malone, PLLC were employed as co-counsel for the Trustee, *Nunc Pro Tunc*, on April 17, 2019.
5. Hendren Redwine was not paid a retainer in this matter.
6. Hendren Redwine has rendered services to the Trustee including providing assistance and advising the Trustee with regard to administration of the case.
7. Hendren Redwine seeks authority to receive payment for fees in the amount of \$8,111.75 and out-of-pocket expenses in the amount of \$91.08 for services rendered from June 2, 2019 through July 31, 2019. A copy of the itemized invoice is attached hereto and marked as Exhibit "A".
8. A summary of the background and qualifications of Hendren Redwine is attached hereto and marked as Exhibit "B".
9. The amount to be paid to Hendren Redwine is fair and reasonable.
10. Payment to Hendren Redwine is in the best interest of the Estate.

WHEREFORE, Hendren Redwine requests payment for fees in the amount of \$8,111.75 and out-of-pocket expenses in the amount of \$91.08 for services rendered in this bankruptcy Estate from June 2, 2019 through July 31, 2019.

DATED: September 5, 2019

HENDREN, REDWINE & MALONE, PLLC

s/Jason L. Hendren

Jason L. Hendren (NC State Bar No. 26869)

Rebecca F. Redwine (NC State Bar No. 37012)

Benjamin E.F.B. Waller (NC State Bar No. 27680)

4600 Marriott Drive, Suite 150

Raleigh, NC 27612

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bwaller@hendrenmalone.com

Co-Counsel for the Trustee

CERTIFICATE OF SERVICE

I, Jason L. Hendren, 4600 Marriott Drive, Suite 150, Raleigh, North Carolina 27612 certify;

That I am, and at all times hereinafter mentioned was, more than eighteen (18) years of age;

That on the 5th day of September, 2019, I served copies of the foregoing **Third Application for Approval to Pay Co-Counsel for the Trustee's Fees** on the parties listed below, by depositing a copy of the same in the United States mail bearing sufficient postage or electronically as indicated.

I certify under penalty of perjury that the foregoing is true and correct.

DATED: September 5, 2019

HENDREN, REDWINE & MALONE, PLLC

s/Jason L. Hendren

Jason L. Hendren (NC State Bar No. 26869)

Rebecca F. Redwine (NC State Bar No. 37012)

Benjamin E.F.B. Waller (NC State Bar No. 27680)

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bwaller @hendrenmalone.com

Co-Counsel for the Trustee

TO:

Marjorie K. Lynch
Office of the Bankruptcy Administrator

(via CM/ECF)

Thomas W. Waldrep
Chapter 11 Trustee

(via CM/ECF)

Rayford K. Adams, III
Counsel for the Debtor

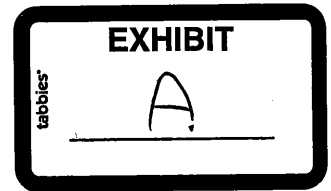
(via CM/ECF)

Hendren, Redwine & Malone PLLC

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CAH Acquisition Company #1, LLC dba W
Waldrep LLP
101 S. Stratford Road, Suite 210
Winston- Salem, NC 27104

September 3, 2019

File #: 6415
Invoice #: 18085

c/o Thomas Waldrep, Trustee

RE:

DATE	DESCRIPTION	HOURS	AMOUNT	RATE	
Jun-02-19	Review and edit of application, notice, exhibits and order; Correspondence re same	0.60	186.00	310.00	RFR
Jun-03-19	Complete accounting on first affidavit of cos	0.10	39.50	395.00	JLH
Jun-03-19	Create summary of time and hours billed by lawyer exhibit for fee application per JNC order; Email to AHS with edited application and direction for finalizing	0.10	31.00	310.00	RFR
Jun-03-19	Draft HRM 2nd Fee App and proposed Order	0.50	55.00	110.00	AHS
Jun-03-19	Review email from GT re wires	0.10	13.00	130.00	JG
Jun-03-19	Follow up with Lyday re: Affinity motion	0.10	13.00	130.00	JG
Jun-04-19	Correspondence to Matthew Petersen re: cash collateral usage and language in Order clarifying limit on use	0.10	39.50	395.00	JLH
Jun-04-19	Attorney telephone call re: review completed task and assign new task to various attorneys; review hearing calendar; US Bank accounts; Discovery for Liberty Bank dispute; reopening of hospitals; managment company options; status of cash collateral and DIP financing needed; review valuation needs (all matters)	0.10	39.50	395.00	JLH

Jun-04-19	Review multiple deficiencies with Debtor filings; Correspondence re same	0.10	31.00	310.00	RFR
Jun-04-19	Attorney conference call re global list of action items, including AP assignment and valuation assignment; Review of upcoming hearings, US Bank, First Liberty and various pleading status (all matters)	0.10	31.00	310.00	RFR
Jun-04-19	Email from RFR re HRM Fee Apps, review edits, modify Exhibit B	0.20	22.00	110.00	AHS
Jun-04-19	Review POC; review NOA and Notice of Ombudsman Report	0.10	13.00	130.00	JG
Jun-04-19	Edit claims summary based on filed POCs; review against UCCs; email to Trip's office re amendments (all cases)	0.20	26.00	130.00	JG
Jun-04-19	Team calls with Waldrep and GT; discussion of action items, employment of professionals, status of various APs, funding, upcoming contested matters, etc (all cases)	0.20	26.00	130.00	JG
Jun-05-19	Review Drumright Receiver counsel questions about Washington case Order addressing data access	0.20	79.00	395.00	JLH
Jun-05-19	Analyze 544,547, 548 and 549 actions (all cases)	0.10	39.50	395.00	JLH
Jun-05-19	Update Exhibit B for HRM 2nd Fee App	0.20	22.00	110.00	AHS
Jun-05-19	Review 547 transfers and invalid UCCs; notes for meeting with JLH	0.30	39.00	130.00	JG
Jun-05-19	Review UCCs in NC, FL,, MO, and OK; create chart re same; meeting with JLH to discuss preferences and upcoming lien avoidance APs (all cases); email to Trip's office re amendment	0.20	26.00	130.00	JG
Jun-06-19	Review prepetition payroll consent order; Meet re hearing on same	0.20	62.00	310.00	RFR
Jun-06-19	Review POC and edit claims summary	0.10	13.00	130.00	JG
Jun-06-19	Draft CO on prepetition wages; email to JLH/RFR re same	0.30	39.00	130.00	JG
Jun-06-19	Review App Group International POC; review	0.10	13.00	130.00	JG

	consent judgment, UCC, and merchant agreement; prepare summary for lien avoidance AP; find registered agent (all cases)				
Jun-07-19	Trustee call; review status of cost reports; status of reopening hospitals; status of AP analysis; status of Trustee provider account levy; Update on sanctions and pending motions deadlines; insurance status (all cases)	0.15	59.25	395.00	JLH
Jun-07-19	Review amended wage consent order	0.20	62.00	310.00	RFR
Jun-07-19	Meet with JG and review status and procedure for APs	0.30	93.00	310.00	RFR
Jun-07-19	Telephone call re cost report status and actions to obtain from all hospitals; Update re status of AP filings and organization and US Bank transactions; Preference issue and UCC research issues; Update on sanctions and pending motions; status of insurance for all hospitals and policies (all cases)	0.15	46.50	310.00	RFR
Jun-07-19	File management	0.10	11.00	110.00	AHS
Jun-07-19	Review POC and edit claims summary	0.10	13.00	130.00	JG
Jun-07-19	Review revised CO from JLH on prepetition wages; email to First Capital counsel re approval of same	0.10	13.00	130.00	JG
Jun-07-19	Email to Lyday re affinity motion	0.10	13.00	130.00	JG
Jun-07-19	Review Complete Business Solutions POC, factoring agreement, UCC, etc, find registered agent, review account transactions, create summary for potential AP (related to 1, 3, 6, 7, 12, & 16)	0.20	26.00	130.00	JG
Jun-07-19	Team call re: mangement in oswego, I70 and Horton, status of cost reports, Status of IT data, update re US Bank issues and AP against First Liberty and GTR, Update on insurance issues, and DIP funding, update re status of lien avoidance APs (all cases)	0.10	13.00	130.00	JG
Jun-10-19	Prepare and file HRM admin expense affidavit for May; review with JLH and file same (all cases)	0.10	13.00	130.00	JG

Jun-10-19	Finalize and file App to Employ ACT; upload order	0.10	13.00	130.00	JG
Jun-10-19	Email to First Capital re CO on wages motion	0.10	13.00	130.00	JG
Jun-10-19	Review email re: employee contact; email to Lyday re same	0.10	13.00	130.00	JG
Jun-11-19	Telephone call with team re: 549 actions, cash management, cash collateral budget adjustment, DIP budget adjustment; reopening of hospitals/options (all cases)	0.15	59.25	395.00	JLH
Jun-11-19	Confirmation re wage hearing resolution; Email and telephone call re same	0.10	31.00	310.00	RFR
Jun-11-19	Review Motion to Confirm Affinity Agreement redline (CAH 1); Correspondence re Motion to Expedite re same	0.20	62.00	310.00	RFR
Jun-11-19	Review AP list of potential preferences	0.30	93.00	310.00	RFR
Jun-11-19	Telephone call re 549 actions and various other transfers (all cases)	0.15	46.50	310.00	RFR
Jun-11-19	Review notice of hearing; edit calendar; review POC and edit claims summary	0.10	13.00	130.00	JG
Jun-11-19	Review email from First Capital counsel; upload CO and email to Court re same	0.10	13.00	130.00	JG
Jun-11-19	Review email re: Fields amended affidavit status	0.10	13.00	130.00	JG
Jun-11-19	Review and reply to email from Lyday re CAH 1 employees	0.10	13.00	130.00	JG
Jun-11-19	Create outline for team call	0.10	13.00	130.00	JG
Jun-11-19	Finalize and file affidavit of Tracy Field; email to BA re same (all cases)	0.10	13.00	130.00	JG
Jun-11-19	Create AP summary; review documents for potential AP against High Speed Capital (1 & 6)	0.20	26.00	130.00	JG
Jun-11-19	Create preference summary; review documents re potential preference demand against Influx Capital (1 & 6)	0.10	13.00	130.00	JG
Jun-11-19	Create AP summary; review documents for	0.10	13.00	130.00	JG

	potential AP against Merchant Funding (1, 6, 7 & 16)				
Jun-12-19	Review court concern regarding special counsel administrative fee; correspondence to co-counsel to address	0.20	79.00	395.00	JLH
Jun-12-19	Correspondence re application to employ special counsel	0.10	31.00	310.00	RFR
Jun-12-19	Review BA objection to App to Employ ACT and withdrawals	0.10	13.00	130.00	JG
Jun-12-19	Finalize and file Motion to Confirm Affinity Agreement and upload order; edit calendar	0.10	13.00	130.00	JG
Jun-12-19	Brief review of factoring agreements/AR Purchases from Trip's office; save to respective AP/Preference file (all cases)	0.10	13.00	130.00	JG
Jun-12-19	Review agreement with Queen Funding; review UCC; complete AP Summary	0.20	26.00	130.00	JG
Jun-12-19	Review agreement with GEL Funding; review UCC; complete AP Summary	0.20	26.00	130.00	JG
Jun-13-19	Review executory contract issues and implement deadlines and systems for processing (in all cases)	0.10	39.50	395.00	JLH
Jun-13-19	Correspondence with Grant Thornton re wires	0.10	31.00	310.00	RFR
Jun-13-19	Create expense matter for BK Attorney Services, move time	0.10	11.00	110.00	AHS
Jun-13-19	Review CO on prepetition wages; review POCs and edit claims summary	0.10	13.00	130.00	JG
Jun-13-19	Review and reply to email from John re: MCA agreements	0.10	13.00	130.00	JG
Jun-13-19	Edit Parker Hudson order; email to Jennifer re: same	0.10	13.00	130.00	JG
Jun-13-19	Review Cigna judgment and docket; complete AP summary for lien avoidance; call with JMM re service (all cases)	0.10	13.00	130.00	JG
Jun-13-19	Review claims and print leases for JLH analysis (all cases)	0.10	13.00	130.00	JG

Jun-13-19	Edit, finalize and file order employing Tracy Field; email to court re same	0.10	13.00	130.00	JG
Jun-13-19	Email to creditor Baxrer Healthcare re copy of lease	0.10	13.00	130.00	JG
Jun-13-19	Review email from Waldrep; upload CO Allowing ACT employment	0.10	13.00	130.00	JG
Jun-14-19	Status call with Grant Thornton re: cash flow at operating hospitals; procedures; DIP financing needed; cash collateral status; reviewed status of management proposals (all cases)	0.05	19.75	395.00	JLH
Jun-14-19	Upload corrected orders allowing employment of ACT	0.10	13.00	130.00	JG
Jun-14-19	Review order allowig app to employ Fields; email to Fields; review POC and edit claims summary	0.10	13.00	130.00	JG
Jun-17-19	Update HRM 2nd Fee App	0.10	11.00	110.00	AHS
Jun-17-19	Review amended matrix	0.10	13.00	130.00	JG
Jun-17-19	Review and reply to email from Holly re: Affinity May accounting	0.10	13.00	130.00	JG
Jun-17-19	Review Baxter lease and email same to Affinity	0.10	13.00	130.00	JG
Jun-17-19	Review MO plan re HPCG treatment; review correspondence; create AP summary re lien avoidance for lack of UCC	0.20	26.00	130.00	JG
Jun-17-19	Finalize and file Motion to Limit Notice; upload order; upload to 3rd party servicer (all cases)	0.10	13.00	130.00	JG
Jun-17-19	Email to Waldrep team re title work on CAH #1	0.10	13.00	130.00	JG
Jun-18-19	Group status call; divide assignments and report on completed action items (all cases)	0.05	19.75	395.00	JLH
Jun-18-19	Follow up re status of title work	0.10	31.00	310.00	RFR
Jun-18-19	Draft demand letter to Queen Funding re: preference for JLH review	0.30	39.00	130.00	JG
Jun-18-19	Draft shell of May report; review bank	0.70	91.00	130.00	JG

	statements and accounting from GT; edit report; email to Holly re itemization of several items				
Jun-19-19	Analyze preference recovery and authorize demand letter against Influx Capital	0.20	79.00	395.00	JLH
Jun-19-19	Analyze preference recovery and authorize demand letter against Queen Funding	0.30	118.50	395.00	JLH
Jun-19-19	Analyze preference recovery and authorize demand letter against WG Capital	0.20	79.00	395.00	JLH
Jun-19-19	Analyze lawsuit against ACE Funding	0.30	118.50	395.00	JLH
Jun-19-19	Analyze lawsuit against App Group International	0.20	79.00	395.00	JLH
Jun-19-19	Analyze lawsuit against GEL Funding	0.40	158.00	395.00	JLH
Jun-19-19	Analyze lawsuit against High Speed Capital re: UCC and preference payments	0.20	79.00	395.00	JLH
Jun-19-19	Analyze lawsuit against Merchant Funding	0.10	39.50	395.00	JLH
Jun-19-19	Review POC and edit claims summary	0.10	13.00	130.00	JG
Jun-19-19	Review preference information with JLH re Influx Capital	0.10	13.00	130.00	JG
Jun-19-19	Review preference information with JLH re Queen Funding	0.10	13.00	130.00	JG
Jun-19-19	Review preference information with JLH re WG Capital	0.10	13.00	130.00	JG
Jun-19-19	Review AP summary and causes of action against App Group with JLH	0.10	13.00	130.00	JG
Jun-19-19	Review AP summary and causes of action against GEL with JLH	0.10	13.00	130.00	JG
Jun-19-19	Review AP summary and causes of action against High Speed with JLH	0.10	13.00	130.00	JG
Jun-20-19	Review and respond to Insurance counsel re: status of replacement insurance	0.10	39.50	395.00	JLH
Jun-20-19	Correspondence with insurance agent re potential admin claim	0.20	62.00	310.00	RFR

Jun-20-19	Discussion with JLH re fee app	0.10	11.00	110.00	AHS
Jun-20-19	Review of Queen Funding preference demand letter	0.10	11.00	110.00	AHS
Jun-20-19	Update Queen Funding Preference Demand Letter	0.10	11.00	110.00	AHS
Jun-20-19	Draft preference demand letter to Influx Capital	0.40	44.00	110.00	AHS
Jun-20-19	Draft preference demand letter to WG Capital	0.20	22.00	110.00	AHS
Jun-20-19	Review email re insurance	0.10	13.00	130.00	JG
Jun-20-19	Review POC and edit claims summary; review orders allowing employment	0.10	13.00	130.00	JG
Jun-20-19	Create outline for staunts conference; email to GT re cash position (all cases)	0.10	13.00	130.00	JG
Jun-21-19	Review and finalize monthly report	0.40	158.00	395.00	JLH
Jun-21-19	Review title search; Correspondence re same	0.20	62.00	310.00	RFR
Jun-21-19	Final review and revision of Queen Funding Preference Demand letter	0.20	22.00	110.00	AHS
Jun-21-19	Final review and revision of Influx Preference Demand letter	0.10	11.00	110.00	AHS
Jun-21-19	Review order on Waldrep Fees; email to GT	0.10	13.00	130.00	JG
Jun-24-19	Review claims and edit claims summary	0.10	13.00	130.00	JG
Jun-24-19	Review email from T; finalize and file May report; email bank statements to BA	0.10	13.00	130.00	JG
Jun-24-19	Review bank statements re electronic transfers; review HAC RCHA accounts re intermediary transfers; edit chart; email to JLH re same (all cases)	0.20	26.00	130.00	JG
Jun-25-19	Telephone call with Trustee and Grant Thornton re: status of Washington operations	0.10	39.50	395.00	JLH
Jun-25-19	Telephone call from Frank Monaco re potential sale involvement	0.20	62.00	310.00	RFR

Jun-25-19	Telephone call with Trustee re case status	0.10	31.00	310.00	RFR
Jun-25-19	Review POCs and edit claims summary	0.10	13.00	130.00	JG
Jun-25-19	Review M2 lease; edit lease chart re same	0.10	13.00	130.00	JG
Jun-25-19	Review returned mail with forwarding address; correct in CMECF; email to Trip's office re same; resend Motion to Limit Notice	0.10	13.00	130.00	JG
Jun-25-19	Review title work and edit claims summary re secured claims	0.10	13.00	130.00	JG
Jun-25-19	Email to Affinity re leased equipment need	0.10	13.00	130.00	JG
Jun-25-19	Discussion with T re exclusivity	0.10	13.00	130.00	JG
Jun-26-19	Additional preference/fraudulent conveyance/lien avoidance analysis in all cases	0.10	39.50	395.00	JLH
Jun-26-19	Update HRM fee app	0.40	44.00	110.00	AHS
Jun-26-19	Meet with JLH re intermediary transfers issues; call with Lanik re same; meet with JLH re RCHA preference; email to JLH re breakdown of transfers for for JP (all cases)	0.10	13.00	130.00	JG
Jun-27-19	Correspondence from Frank Monaco and Trustee re conference call	0.10	31.00	310.00	RFR
Jun-27-19	Continue revisions to HRM Fee App	0.20	22.00	110.00	AHS
Jun-27-19	Finalize and send preference demand letters	0.30	33.00	110.00	AHS
Jun-27-19	Review POCs and edit claims summary	0.10	13.00	130.00	JG
Jun-27-19	Draft Motion and order to Ext Exclusivity and 180 day deadline; email to JLH/RFR for review and edit	0.50	65.00	130.00	JG
Jun-27-19	Draft complaint against App Group International; review all exhibits needed (all cases)	0.50	65.00	130.00	JG
Jun-28-19	Edit Application for Ext of Time and Order re same (#1); Follow up correspondence	0.30	93.00	310.00	RFR
Jun-28-19	File management	0.10	11.00	110.00	AHS

Jun-28-19	Review POCs and edit claims summary	0.10	13.00	130.00	JG
Jul-01-19	Respond to Rob Vanderbeek re fee application deadline	0.10	31.00	310.00	RFR
Jul-01-19	Analysis of hours and work performed for fee application	0.30	93.00	310.00	RFR
Jul-01-19	Telephone call with Equity Partners and Trustee (CAH 1)	0.30	93.00	310.00	RFR
Jul-01-19	Email re fee applications from Lyday	0.10	31.00	310.00	RFR
Jul-01-19	Review and edit motion and order for extension of time; Telephone call re same (1)	0.30	93.00	310.00	RFR
Jul-01-19	Discussion with RFR re Exhibit B for HRM Fee App, final calculations and complete same	1.90	0.00	0.00	AHS
Jul-01-19	Review POCs and edit claims summary	0.20	26.00	130.00	JG
Jul-01-19	Review email from John re Motion to Limit Notice; email to JLH/RFR re same	0.10	13.00	130.00	JG
Jul-01-19	Review and reply to email re RCHA transfer	0.10	13.00	130.00	JG
Jul-02-19	Correspondence from Waldrep re conference call and data review	0.10	31.00	310.00	RFR
Jul-02-19	Telephone call with Trustee re outcome of hearing, fee application status and DIP lending issues	0.60	186.00	310.00	RFR
Jul-02-19	Revision to Exhibit B and HRM Fee App	0.30	33.00	110.00	AHS
Jul-02-19	Review appointment of ombudsman	0.10	13.00	130.00	JG
Jul-02-19	Email to Trustee re: claims summary and insurance company information	0.10	13.00	130.00	JG
Jul-03-19	Review lab scam memo; Correspondence with Trustee re phone call	0.20	62.00	310.00	RFR
Jul-03-19	Finalize and file HRM 2nd Fee App	0.50	55.00	110.00	AHS
Jul-03-19	Serve HRM 2nd Fee App	0.10	4.50	45.00	AHS

Jul-03-19	Review requests for notices; review POCs and edit claims summary	0.10	13.00	130.00	JG
Jul-03-19	Email to/from GT re fees; review email from Lyday re First Capital approval	0.10	13.00	130.00	JG
Jul-03-19	Draft HRM affidavit re: June admin expenses (all cases)	0.10	13.00	130.00	JG
Jul-03-19	Draft complaint against NC Commerce; email to JLH/RFR	0.80	104.00	130.00	JG
Jul-08-19	Telephone call with employee counsel (#1)	0.10	31.00	310.00	RFR
Jul-08-19	Meeting with JG re logistics of AP filings; Research re same	0.30	93.00	310.00	RFR
Jul-08-19	Telephone call with Travis Sasser re prepetition payroll claim	0.30	93.00	310.00	RFR
Jul-08-19	Review POC and edit claims summary	0.10	13.00	130.00	JG
Jul-08-19	Email to clerk re insurance company additions to matrix	0.10	13.00	130.00	JG
Jul-08-19	Call with clerk re APs	0.20	26.00	130.00	JG
Jul-08-19	Add insurance creditors to matrix; call with clerk re same	0.30	39.00	130.00	JG
Jul-08-19	Review and reply to email from T re order; email to court re affinity order	0.10	13.00	130.00	JG
Jul-09-19	Update re prepetition payroll and operation status; Meet with JLH re same	0.30	93.00	310.00	RFR
Jul-09-19	Finalize and file Motion to Ext Exclusivity; upload order and serve; edit calendar (all cases)	0.20	26.00	130.00	JG
Jul-09-19	Finalize and file HRM affidavit re expenses; email to GT re same	0.10	13.00	130.00	JG
Jul-09-19	Draft complaint against High Speed Capital; email to JLH/RFR for review and edit	0.50	65.00	130.00	JG
Jul-10-19	Correspondence with Sasser re payroll taxes	0.10	31.00	310.00	RFR
Jul-10-19	Follow up from Sasser re claim	0.10	31.00	310.00	RFR

Jul-10-19	Update preference chart, hard file management	0.10	11.00	110.00	AHS
Jul-10-19	Review of emails from JG to Grant Thornton re June Monthly Report	0.10	11.00	110.00	AHS
Jul-10-19	Email to JLH re NC treasurers office claim	0.10	13.00	130.00	JG
Jul-10-19	Call with GT re status of funds in each case, cash flow and accounting; call with JLH re same (all cases)	0.10	13.00	130.00	JG
Jul-12-19	Review Adams fee app; edit calendar; review POCs and edit claims summary	0.10	13.00	130.00	JG
Jul-12-19	Review email re status of insurance	0.10	13.00	130.00	JG
Jul-15-19	Review Hitachi Capital lease	0.30	93.00	310.00	RFR
Jul-15-19	Receipt of undelivered preference demand letter, update chart, hard file management	0.10	11.00	110.00	AHS
Jul-15-19	Begin draft of June Monthly Report	0.30	33.00	110.00	AHS
Jul-15-19	Review Ombudsman's motions; edit calendar; review POCs and edit claims summary; email to Affinity re Hitachi lease	0.10	13.00	130.00	JG
Jul-16-19	Meet with JG re outstanding action items and agenda	0.20	62.00	310.00	RFR
Jul-16-19	Review Jon Friesen NOA and Motion to Assume	0.10	31.00	310.00	RFR
Jul-16-19	Telephone call re leases and executory contracts (#1)	0.10	31.00	310.00	RFR
Jul-16-19	Correspondence with Trustee and co-counsel re weekly calls	0.10	31.00	310.00	RFR
Jul-16-19	Follow up re Cardinal Health set off claim	0.10	31.00	310.00	RFR
Jul-16-19	Review of email from JG to Holly re accounting for June Monthly Reports	0.10	11.00	110.00	AHS
Jul-16-19	Review NOA and Motion to Enter Into Contract; review POCs and edit claims summary	0.30	39.00	130.00	JG
Jul-16-19	Email to T re Cardinal POC	0.10	13.00	130.00	JG

Jul-17-19	Update re budget status for Washington; Correspondence re same	0.20	62.00	310.00	RFR
Jul-17-19	Review POC and edit claims summary	0.10	13.00	130.00	JG
Jul-18-19	Email from Adam re legal fees; email to team re same	0.10	13.00	130.00	JG
Jul-18-19	Review and reply to email from Trustee re: claims review	0.10	13.00	130.00	JG
Jul-18-19	Draft complaint against Merchant Advance; review merchant agreement and all other documents (all cases)	0.20	26.00	130.00	JG
Jul-22-19	Correspondence with Trustee re claims docket	0.20	62.00	310.00	RFR
Jul-22-19	Continue draft of June Monthly Report	0.60	66.00	110.00	AHS
Jul-22-19	Edits to Merchant complaint re intermed transfers; email to JLH/RFR for review	0.20	26.00	130.00	JG
Jul-23-19	Review RCHA debits of Debtors' accounts and use of funds (all cases)	0.05	19.75	395.00	JLH
Jul-23-19	Correspondence re new budgets, expenses, and professional fees	0.10	31.00	310.00	RFR
Jul-23-19	Continue draft of Monthly Report	3.60	396.00	110.00	AHS
Jul-23-19	Email to JLH re status of preference demand letters	0.10	13.00	130.00	JG
Jul-23-19	Draft complaint against ACE Funding Source; review documents and preferences (all cases)	0.10	13.00	130.00	JG
Jul-24-19	Continue draft of June Monthly Report	0.80	88.00	110.00	AHS
Jul-24-19	Follow up with Holly re: budgets	0.10	13.00	130.00	JG
Jul-24-19	Review tax records; edit summary; email to JLH re case status	0.20	26.00	130.00	JG
Jul-25-19	Review objection to fee apps by First Capital	0.10	31.00	310.00	RFR
Jul-25-19	Emails from/to BA re fee app spreadsheet	0.10	31.00	310.00	RFR

Invoice #:

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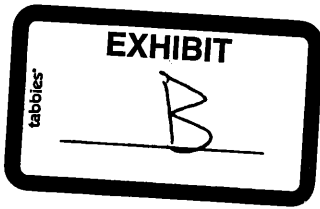
Jul-25-19	Email re extension to respond to application from BA; Email re demand letter response	0.20	62.00	310.00	RFR
Jul-25-19	Email to BA with invoice in excel format	0.10	11.00	110.00	AHS
Jul-25-19	Review objection to HRM fees; email to JLH re same	0.10	13.00	130.00	JG
Jul-25-19	Draft NOA for BW	0.10	13.00	130.00	JG
Jul-25-19	General case update with JLH	0.10	13.00	130.00	JG
Jul-25-19	Email claims to Trustee; call with Lyday re same	0.10	13.00	130.00	JG
Jul-26-19	Emails to and from Holly re bank transactions	0.10	11.00	110.00	AHS
Jul-26-19	Receipt of returned preference demand letter from WG Capital, update chart	0.10	11.00	110.00	AHS
Jul-26-19	Review response to limited notice	0.10	13.00	130.00	JG
Jul-26-19	Review email re fees	0.10	13.00	130.00	JG
Jul-29-19	Review order on extension of time; Telephone call with JLH re case update (#1); Review response from BA office re lease agreement motion; Review stipulation on cash collateral	0.40	124.00	310.00	RFR
Jul-29-19	Correspondence with Lyday and Holly Kelly re wires and fee application payments; Follow up with JLH re same	0.30	93.00	310.00	RFR
Jul-29-19	Review BA obj to Motion to Enter Into Lease & stipulation	0.10	13.00	130.00	JG
Jul-30-19	Correspondence re meeting with Grant Thornton; Meet with JLH re same	0.20	62.00	310.00	RFR
Jul-30-19	Continue draft of CAH Monthly Report	1.00	110.00	110.00	AHS
Jul-31-19	Review notice of hearing on application to employ; Meet with JG re Grant Thornton meeting preparation	0.20	62.00	310.00	RFR
Jul-31-19	Prepare Motion for Extension of Time to File June Monthly Report	0.40	44.00	110.00	AHS

Jul-31-19	Review notice of hearing and edit calendar; review response to Ombudsman employment applications	0.10	13.00	130.00	JG
	Totals	44.25		\$8,111.75	

DISBURSEMENTS

Jun-07-19	Parking for 341		1.57	
Jun-07-19	PACER		72.01	
Jun-25-19	Postage resend Motion to Limit Notice 1 @ 0.50		0.50	
Jun-27-19	Postage Preference letter to Queen Funding 1 @ 6.80		6.80	
Jun-27-19	Postage Preference demand letter to WG 1 @ 6.80		6.80	
Jun-27-19	Postage Preference Demand letter to Influx 1 @ 3.40		3.40	
	Totals		\$91.08	
	Total Fee & Disbursements			\$8,202.83

Total Payments			
Timekeeper	Rate	Hours	Amount
Jason L Hendren	\$395.00	3.95	\$1,560.25
Rebecca F. Redwine	\$310.00	10.00	\$3,100.00
Alston Shave	\$94.15	13.60	\$1,280.50
Jenny Gorman	\$130.00	16.70	\$2,171.00



BIOGRAPHICAL INFORMATION
HENDREN, REDWINE & MALONE, PLLC

JASON L. HENDREN

Jason L. Hendren is a Board Certified Specialist in Business Bankruptcy. Mr. Hendren was admitted to the North Carolina Bar in 1999. He attended Lee University where he earned a Bachelor of Arts degree, magna cum laude, in History and received the departmental award. He received his J.D., magna cum laude, from the University of Tennessee School of Law in 1999. While in law school, Mr. Hendren served on the Tennessee Law Review as an Editor of Student Materials from 1997 through 1999 and was inducted into the Order of the Coif. Mr. Hendren is a partner at Hendren, Redwine & Malone, PLLC, focusing in the areas of Bankruptcy and Civil Litigation. Mr. Hendren is regularly selected by Business North Carolina as Legal Elite in Bankruptcy and has also appeared frequently in Super Lawyers Magazine. Mr. Hendren served as Research Assistant to Justices Mark D. Martin and George L. Wainwright, Jr. of the Supreme Court of North Carolina prior to entering private practice. Mr. Hendren also serves on the board of directors for the Eastern Bankruptcy Institute, Inc. Mr. Hendren speaks frequently on the topic of Chapter 11 bankruptcy.

REBECCA F. REDWINE

Rebecca F. Redwine is a Board Certified Specialist in Business Bankruptcy. Ms. Redwine earned a Phi Beta Kappa key from North Carolina State University, where she graduated *summa cum laude* with a Bachelor of Arts in English in 2004. She then graduated from the University Of North Carolina School Of Law in 2007, where she was a client coordinator with the *pro bono* Community Legal Project and served on the executive board of the Domestic Violence Advocacy Project. She also served as a research assistant to Administrative Law Judge James J. Brown. Ms. Redwine is a partner at Hendren, Redwine & Malone, PLLC, focusing in the areas of Bankruptcy and Civil Litigation. Ms. Redwine is admitted to practice in all state and federal courts in North Carolina. She is a member of the North Carolina Bar Association; the North Carolina Association of Women Attorneys; the American Bar Association; and the North Carolina State Bar. Ms. Redwine is a council member of the North Carolina Bar Association Bankruptcy Section Council and serves as co-chair of the Pro Bono Committee for Council. She works as a volunteer lawyer for Lawyer on the Line. Ms. Redwine has spoken at several bankruptcy seminars, regarding Chapter 11 and Chapter 7 bankruptcies. Ms. Redwine was included in Super Lawyers magazine as a North Carolina Rising Star for years 2010, 2012, 2013 and 2017 through 2019. Additionally, Ms. Redwine was selected as Legal Elite in Bankruptcy from 2013 through 2019 and was selected for the 24th, 25th, 26th Edition of Best Lawyers in America in Bankruptcy and Creditor and Debtor Rights.

JENNY GORMAN

Jenny Gorman is a 2010 graduate of UNC-Wilmington with a Bachelor of Science in Criminal Justice. Ms. Gorman is a 2012 graduate of the Meredith College Paralegal Program and a North Carolina Certified Paralegal. Ms. Gorman was employed with Butler & Butler, LLP from 2006 to 2010, focusing in the area of Chapter 7 bankruptcy. Prior to joining Hendren, Redwine & Malone in 2012, Ms. Gorman was a paralegal with the United States Bankruptcy Administrator's Office, focusing on Chapter 11 bankruptcies in the Eastern District of North Carolina. Ms. Gorman spoke at the 2014 Eastern District Seminar on Chapter 11 issues for paralegals. Ms. Gorman has extensive experience in all aspects of Chapter 11 and Chapter 7 bankruptcy proceedings, including consumer and business bankruptcies. Specifically, Ms. Gorman is proficient in preparing bankruptcy schedules and all required pleadings of the Court. On a daily basis, she meets and works closely with the firm's Chapter 11 clients to enable timely filing of monthly reports and to ensure compliance with all document production requirements. In addition to her bankruptcy experience, Ms. Gorman is solely responsible for the firm's daily calendar management system and case management which requires extensive communications with attorneys, paralegals, clients, creditors and court staff.

ALSTON SHAVE

Alston Shave is a 2004 graduate of UNC Chapel Hill with a Bachelor of Arts in English. Ms. Shave is a 2005 graduate of the Duke University Paralegal Program and a North Carolina Certified Paralegal. Prior to joining Hendren, Redwine & Malone in 2014, Ms. Shave was employed with Brooks, Stevens & Pope from 2006-2014 with a focus in the area of workers' compensation defense. While there, her responsibilities included the drafting of settlement agreements, confidentiality agreements, discovery, motions and proposed orders. In addition, she was responsible for the scheduling of mediations and depositions, as well as maintaining the daily calendars for her attorneys. As a paralegal at Hendren, Redwine & Malone, Ms. Shave focuses on Chapter 7 and 11 bankruptcies and state court matters.

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NORTH CAROLINA
GREENVILLE DIVISION

IN RE:)	
)	Case No. 19-00730-5-JNC
CAH ACQUISITION COMPANY #1, LLC d/b/a)	
WASHINGTON COUNTY HOSPITAL,)	Chapter 11
)	
Debtor.)	
)	
)	

NOTICE OF THIRD APPLICATION FOR APPROVAL TO PAY CO-COUNSEL FOR THE
TRUSTEE'S FEES

NOTICE IS HEREBY GIVEN that Hendren, Redwine & Malone, PLLC ("Hendren Redwine"), has filed a Third Application for Approval to Pay Co-Counsel for the Trustee's Fees; and,

FURTHER NOTICE IS HEREBY GIVEN that Hendren Redwine has applied for compensation in the amount of EIGHT THOUSAND ONE HUNDRED ELEVEN DOLLARS AND 75/100 (\$8,111.75) and NINETY-ONE DOLLARS AND 08/100 (\$91.08) for reimbursement of expenses pursuant to 11 U.S.C. § for the period of June 2, 2019 through July 31, 2019; and,

FURTHER NOTICE IS HEREBY GIVEN that this Application may be allowed provided no responses and request for a hearing is made by a party in interest in writing to the Clerk of this Court within TWENTY-ONE (21) DAYS from the date of this notice; and,

FURTHER NOTICE IS HEREBY GIVEN, that if a response and a request for a hearing is filed by a party in interest in writing within the time indicated, a hearing will be conducted on this Report and Application and Response thereto at a date, time and place to be later set by the Court and all interested parties will be notified accordingly. If no request for a hearing is timely filed, the Court may rule on the Report and Application and Response thereto ex parte without further notice.

DATE: September 5, 2019

HENDREN, REDWINE & MALONE, PLLC

s/Jason L. Hendren

Jason L. Hendren (NC State Bar No. 26869)

Rebecca F. Redwine (NC State Bar No. 37012)

Benjamin E.F.B. Waller (NC State Bar No. 27680)

4600 Marriott Drive, Suite 150

Raleigh, NC 27612

Telephone: 919-420-7867

Telefax: 919-420-0475

Email: jhendren@hendrenmalone.com

rredwine@hendrenmalone.com

bwaller@hendrenmalone.com

Co-Counsel for the Trustee

CERTIFICATE OF SERVICE

I, Jason L. Hendren, 4600 Marriott Drive, Suite 150, Raleigh, North Carolina 27612 certify;

That I am, and at all times hereinafter mentioned was, more than eighteen (18) years of age;

That on the 5th day of September, 2019, I served copies of the foregoing **Notice of Third Application for Approval to Pay Co-Counsel for the Trustee's Fees** on the parties listed below, by depositing a copy of the same in the United States mail bearing sufficient postage or electronically as indicated.

I certify under penalty of perjury that the foregoing is true and correct.

September 5, 2019

HENDREN, REDWINE & MALONE, PLLC

s/Jason L. Hendren

Jason L. Hendren (NC State Bar No. 26869)

Rebecca F. Redwine (NC State Bar No. 37012)

Benjamin E.F.B. Waller (NC State Bar No. 27680)

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Telephone: 919-420-7867

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Email: jhendren@hendrenmalone.com

rredwine@hendrenmalone.com

bwaller@hendrenmalone.com

Co-Counsel for the Trustee

TO:

Marjorie K. Lynch (via CM/ECF)
Office of the Bankruptcy Administrator

Rayford K. Adams (via CM/ECF)
Counsel for the Debtor

Ryan J. Adams (via CM/ECF)
Counsel for Aspirar Medical Lab, LLC

Brian R. Anderson (via CM/ECF)
Nancy A. Peterman
Counsel for Health Care Ombudsman

E. Franklin Childress (via CM/ECF)
Counsel for CAH Acquisition Company 11, LLC

John Paul H. Cournoyer (via CM/ECF)

Counsel for Paul Nusbaum & Steve White

Jonathan E. Friesen (via CM/ECF)
Counsel for Wendy C. Phillips

Terri L. Gardner (via CM/ECF)
Counsel for Petitioning Creditors

Steven A. Ginther (via CM/ECF)
Counsel for MO Dept. of Revenue

David J. Haidt (via CM/ECF)
Nicholas Zluticky
Counsel for First Liberty Bank

Patricia E. Hamilton (via CM/ECF)
Wesley Smith
Sharon Stole
Counsel for Brent King

Tyler R. Heffron (via CM/ECF)
Felton Parrish
Counsel for Hillsboro

Eric L. Johnson (via CM/ECF)
Mathew A. Petersen
Stephen W. Petersen
Jeffrey Whitley
Counsel for First Capital Corporation

Katherine McCraw (via CM/ECF)
Counsel for NC DHHS

Brian H. Smith (via CM/ECF)
Counsel or Complete Business Solutions

John M. Sperati (via CM/ECF)
Counsel for Somerset Capital Group